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LETTER REGARDING U S AIR FORCE RESPONSES TO REGULATORY COMMENTS ON DRAFT WORK PLAN, HEALTH AND SAFETY PLAN, QUALITY ASSURANCE PLAN AND FIELD SAMPLING PLAN FOR SANITARY SEWER SYSTEM NAS FORT WORTH TX
2/5/1997
AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE

File: 17G
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NAVAL AIR STATION FORT WORTH JRB CARSWELL FIELD TEXAS

ADMINISTRATIVE RECORD COVER SHEET

AR File Number 391

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391

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE CENTER FOR ENVIRONMENTAL EXCELLENCE
BROOKS AIR FORCE BASE TEXAS

5 Feb 97

MEMORANDUM FOR TNRCC
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
ATTN: **MR. MARK WEEGAR**
PARK 35 CIRCLE, MC 127
12015 N. IH-35
AUSTIN, TX 78753

FROM: HQ AFCEE/ERB
3207 North Road, Bldg 532
Brooks AFB, TX 78235-5363

SUBJECT: Response to 4 Feb 97 Draft Approval With Modifications for Draft Work Plan, Health & Safety Plan Addendum, Quality Assurance Project Plan Addendum (Volume 2) and Field Sampling Plan, November 1996, Project 96-8112 Sanitary Sewer System, Contract 41624-94-D-8047/0039, Carswell AFB

1. Attached is the response to the subject letter concerning the RCRA Facility Investigation and Corrective Measures Work Plan for the Sanitary Sewer System at Carswell AFB. Please review the attached comments for concurrence with your request for modifications. Mobilization of field work is scheduled for 24 Feb 97.

2. If you require additional comments please inform me prior to mobilization of field work. If you have any questions or comments concerning this effort please call me at (210) 536-6452.

Charles A. Rice

CHARLES A. RICE
Team Chief
Base Closure Restoration Division

Enclosures: 1
1. Response to 4 Feb 97 Draft TNRCC Letter

Response to Comments - DO39
Project No. 768579; NAS Ft. Worth - Work Plan, Health and Safety Plan, Field Sampling Plan, and Quality Assurance Project Plan
RCRA Facility Investigation of Sanitary Sewer System

TNRCC Comments 2/4//97

The following responses are keyed by numbers to the bullets in the TNRCC comments:

1. The Air Force will comply with the comment and collect discrete surface soil samples in the depth interval from a depth from 0 to 2 feet. (Section 3.1.1, Field Procedures)

2. The Air Force will incorporate all data available for oil/water separator investigations that are applicable.

3. The Air Force concurs with the comment and will collect and analyze one sample at each groundwater location immediately above the water table. This will be determined based on the elevations from groundwater elevation maps. Because there could be residual soil contamination from seasonal fluctuations of groundwater there will be verification of whether a previous release has occurred from the sewer line or if there has been transport for past groundwater contamination not associated with the sanitary sewer line..

4. The Air Force agrees that it will use Direct Push Technology (DPT) as a screening tool. The Air Force will also install 25% temporary wells utilizing DPT equipped with Power Punch® by GeoInsight or equivalent. This technology allows full screening of the saturated zone, including penetration of the basal gravels, and will use a bentonite annular seal above the screen. This meets the criteria established by the National Water Well Association for wells. The installation will allow the collapse of native soils around the well screen to provide an effective transmission of groundwater from relatively undisturbed formation into the well screen. This technology has been recently used successfully by CH2M Hill at NAS Ft Worth.

   There will also be an additional assessment for need to install permanent monitoring wells during the investigation. Where temporary wells confirm a release to groundwater from the sanitary sewer system, the Work Plan provides for permanent groundwater monitoring wells to be installed and sampled for site groundwater characterization. The Work Plan provides for site selection of permanent groundwater monitoring wells to be made in the field by the Air Force and its designated representatives. A review has been made of the Bergstrom AFB Work Plan and it is believed that this will satisfy the issues there.

5. The Air Force agrees that any activated carbon which is unacceptable for regeneration/recycling will be reclassified and properly disposed.

6. The Air Force notes TNRCC comments regarding the disposal of investigative derived waste (IDW) and will consult with TNRCC prior to disposal of soil cuttings which are

contaminated in excess of Risk Reduction Rule Standard 1 (RRRS1). Work Plan text will be changed accordingly.

7. The use of health-based screening levels and the rejection of infrequently detected constituents during COC identification is available under Risk Reduction Standard 3 with TNRCC approval. Any COCs that are eliminated in the risk assessment will be fully explained and justified. Chemicals exceeding maximum contaminant levels (MCLs) or other ARARs will be included, regardless of other screening criteria.

8. The Air Force concurs. A direct comparison to background (UTLs) or PQLs will be performed.

9. The Air Force agrees that releases will be assessed individually or along a given sewer line as applicable. The potential outlets, concentration profiles, locations along the sewer line, and potential sources will be considered in any elimination of chemicals detected in fewer than 5% of the samples. The Texas Reducation Rules will be followed regarding defining hazardous constituents to the PQL or background. To gain a 95 percent confidence of the areal and vertical extent of contamination may require additional extent verification which could require an ancillary investigation. Investigation results will be addressed on an individual case-by-case basis with TNRCC after receipt of the RFI analytical results to verify agreement on the COCs..

10. Ecological impacts will be considered. The Air Force's proposed approach will be to employ the checklist provided as Appendix I of the draft ***Guidance for Conducting Ecological Risk Assessment under the Texas Risk Reduction Program***. Human health PRGs will be developed, and then tested to determine whether they are sufficiently protective of ecological receptors. This approach was outlined by Larry Champagne, TNRCC, in a public comment meeting on January 16, 1996.

11. PRGs will be developed for both carcinogens and systemic toxicants (i.e., non-carcinogens) using methodology specified in 30 TAC §335.556 (Standard Two) or 30 TAC §335.563(Standard Three). Any missing text will be incorporated into the final investigation documents.

12. Justification for any departures from default parameters will be provided. Justification for residential versus industrial exposure parameters will be provided on a release-by-release basis.

13. The Air Force and its subcontractors recognize the primacy of the Risk Reduction Rules (30 TAC 335 Subchapter S) over EPA RAGS.

14. The Air Force concurs with soil and groundwater sample locations scheduled to be collected at up gradient locations and where the NAS Fort Worth sanitary sewer discharges into the City of Fort Worth line to determine if releases from NAS Fort Worth may have impacted the City of Fort Worth sewer.

15. The Air Force recognizes the intention of the investigation and will eliminate those sample points in or on the periphery of residential areas. There will be some limited sampling retained in these areas to permit property transfer.

16. The Air Force agrees that the screened interval will not extend more than 2 feet above the historic groundwater elevation. The Air Force will shorten the height of the screen as suggested.

17. The Air Force will plan on a 10-foot length screen; however, if it appears that a longer screen is required, this will be discussed with the TNRCC as suggested on a case-by-case basis.

18. The investigation will look for dense phase contaminants, The presence of dense phase separated liquids will be most commonly determined when the concentration of the chemicals approaches the saturation limit of the compound. Actual discovery of DNAPL material for an investigation covering an area of this size with the proposed number of sample locations would be based on laboratory analytical results, probably not field results.

19. The Air Force will incorporate micropurging techniques into the Field Sampling Plan for sampling of groundwater samples collected from DPT temporary monitoring wells or permanent monitoring well sampling points. This will use a peristaltic pump with low flow purging and sampling techniques and will not use bailers. The low flow technique will be accomplished at a rate of 100-300 ml/min until groundwater quality parameters, including pH, temperature, conductivity, dissolved oxygen and turbidity have stabilized. These parameters will be monitored and recorded to determine when representative groundwater has been recovered and can be sampled.

    Micropurging techniques will allow for the development and collection of a low turbidity groundwater sample once all the parameters above have stabilized. It must be recognized however that a turbidity of 5 NTU or less may not be feasible for these new wells. Stabilization using this technique is designed to give a representative sample result even though the 5 NTU may not be achieved.

20. The Air Force concurs and field filtering of groundwater samples will not be performed for total metals analysis. No filtered groundwater samples will be collected

21. The proposed analytical quantification limits will be included in the final plans. The lowest quantification limits will be included and if any PQLs are higher than the RRS 2 or 40 CFR 264 values there will be appropriate justification for their use provided to TNRCC.

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